

# memorandum

DATE: MAY 19 1992  
REPLY TO:  
ATTN OF: ERD:JLP:5476  
SUBJECT: South Interceptor Ditch Sediments  
TO: J. E. Evered, Director  
Environmental Management  
EG&G Rocky Flats, Inc.



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Jen Pepe, Gail Hill, and Greg Litus held a meeting on April 13, 1992, with Bob Stevens and Keith Motyl concerning the status of proposed construction activities required for maintenance of the South Interceptor Ditch (SID). They discussed five issues that warrant further action by EG&G before any maintenance construction can proceed. These issues are SID characterization, risk assessment, natural resource impacts, post construction management, and NEPA review.

## SID Characterization

The RCRA Facility Investigation / Remedial Investigation (RFI/RI) for Operable Unit 5 (OU5) requires characterization of sediments in the SID. The purpose of this characterization is to identify any contamination that may exist in the sediments and provide data that we will use to support future remedial actions.

Since the SID is an active surface water control structure, the schedule for these Interagency Agreement (IAG) activities is incompatible with the requirements for SID maintenance. However, the goals of sediment characterization for maintenance and remediation are the same. Prior to any construction activities, EG&G will prepare a detailed characterization of sediment quality using all available information. This will include samples of sediment and water collected for the Site-Wide sampling program, sediment and water samples collected near the Old Landfill on August 8, 1990, samples collected to support the storm water discharge permit, and any other information that will support sediment characterization. Coordinate the development of this report with my staff so that DOE and EG&G will concur on the substance and format. We will present this characterization report to EPA and CDH prior to any construction activities.

For some extended period after construction activities are complete, elevated suspended sediment transport during storm events will probably occur. Since C2 Pond water quality is a priority issue, prudent management of the pond requires a detailed report on the impact that sediment transport will have on C2 water and sediment quality. This report will be part of the SID characterization and will include an estimate of sediment loading and potential water quality degradation to pond C2.

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### Risk Assessment

The disposition of dredged sediments from the SID and the potential risk this material poses is a required product of the SID characterization. The proposed disposition of any dredged material is placement on the north side of the SID and stabilization by spreading and seeding. Base the risk assessment on this scenario and propose a contaminant list that should satisfy the concerns of the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH).

### Natural Resource Impacts

Propose an assessment strategy for impacts to the wildlife habitat. The strategy should specifically address the concerns of the US Fish and Wildlife Service (FWS). Rehabilitating the SID will permanently remove established wetland habitat. Incorporate this impact into the plant wide strategy for management of wildlife habitat. In addition, incorporate information about scheduled surveys for the Ute Ladies' Tresses and potential mitigation alternatives.

### Post Construction Management

After the SID rehabilitation, best management practice requires a plan for continued maintenance of the structure. Complete this plan in two phases. The first phase includes any management changes required for C-2 as a result of the rehabilitation. Develop and deliver this portion of the plan in conjunction with the SID characterization. The second phase will detail continued maintenance of the SID. Since, continued maintenance procedures will be contingent on final construction conditions, we require the complete draft maintenance plan one month after construction is complete.

Additionally, include future sampling of the SID to support the goals of the OU5 RFI/RI as an appendix in the plan. By accelerating the rehabilitation of the SID ahead of the IAG schedule, the investigation of sediments as described in the RFI/RI will be moot. However, after completion of all rehabilitation activities, monitoring the SID for flow of suspended sediments and surface water associated with the Old Landfill will be necessary to fulfill OU5 characterization requirements.

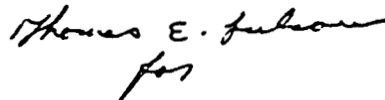
### NEPA

Concurrent with activities requested above, we ask that you complete the appropriate NEPA documentation for a Categorical Exclusion. We understand that your staff has started this process. Since results from the SID characterization and risk assessment will be integral to the NEPA documentation, coordinate the effort so you can meet the proposed construction schedule.

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Although there are five distinct tasks required to progress toward rehabilitation of the SID, we consider SID rehabilitation a single project. Final approval to proceed with construction activities will require concurrence from the EPA, CDH and the FWS. Therefore, please integrate these individual tasks into a comprehensive strategy that will demonstrate responsible management.

The current tentative schedule for completion of construction activities is November 1992. Since the start of construction hinges on the development of a thorough plan, please develop an aggressive schedule for the actions requested in this memo. If you have any questions, please call Frazer Lockhart at extension 7846 or Jen Pepe at extension 2184 of my staff.



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